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May 31, 2007

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, S.W., Room TW-A325  
Washington, DC 20554-0004

Subject: WC Docket No. 07-102; DA 07-2067  
Comments of Cordova Telephone Cooperative, Inc.  
In Support of Petition for Declaratory Ruling

Dear Ms. Dortch:

Attached for filing with the Commission are Cordova Telephone Cooperative, Inc.'s Comments in Support of Petition for Declaratory Ruling in the docket referenced above. These comments are being submitted via the Commission's electronic filing system.

Sincerely yours,

KEMPEL, HUFFMAN AND ELLIS, P.C.  
Attorneys for Cordova Telephone Cooperative, Inc.



Dean D. Thompson

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cc: Margaret Daily, Pricing Policy Division, Wireline Competition Bureau, FCC  
Best Copy and Printing, Inc.

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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of )  
 )  
Interior Telephone Company, Inc. ) WC Docket No. 07-102  
 )  
Petition for Declaratory Ruling ) DA 07-2067  
On the Scope of the Duty of a )  
Rural Local Exchange Carrier to )  
Provide Interim Interconnection )  
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**COMMENTS OF CORDOVA TELEPHONE COOPERATIVE, INC.**  
**IN SUPPORT OF PETITION FOR DECLARATORY RULING**

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Filed: May 31, 2007

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**COMMENTS OF CORDOVA TELEPHONE COOPERATIVE, INC.**  
**IN SUPPORT OF PETITION FOR DECLARATORY RULING**

Cordova Telephone Cooperative, Inc. ("CTC") submits these brief comments in support of the Petition for Declaratory Ruling filed on May 3, 2007, in the docket by Interior Telephone Company, Inc. ("Interior"). CTC is a rural incumbent local exchange company ("ILEC") and a member-owned telephone cooperative that serves approximately 2,000 access lines in Cordova, Alaska. On September 23, 2005, General Communication, Inc. ("GCI") was certificated by the Regulatory Commission of Alaska ("RCA") to provide competitive local exchange services in CTC's rural study area. *See* RCA Order Nos. U-05-4(1) (Sep. 23, 2005) and U-05-4(2) (Nov. 14, 2005). At some point in the future, CTC will be required to negotiate an interconnection agreement with GCI for Section 251(a) and (b) interconnection and services under the procedures set forth in Section 252 of the Telecommunications Act of 1996 ("the Act").

For the reasons stated in Interior's Petition for Declaratory Ruling, CTC urges the Commission to issue a ruling clarifying that 47 C.F.R. § 51.715 does not require an ILEC to provide interim interconnection when it is in the process of negotiating non-price interconnection

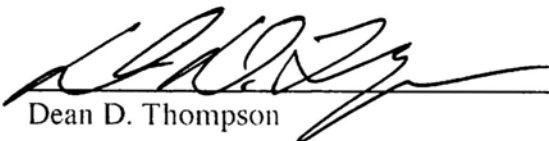
1 terms under the procedures established in Section 252 of the Act. In particular, CTC concurs  
2 with Interior that 47 C.F.R. § 51.715 is properly interpreted to require interim transport and  
3 termination *pricing*. That rule should not be interpreted, as GCI proposes, to impose a general  
4 obligation on an ILEC to provide interim *interconnection* while Section 252 interconnection  
5 negotiations of non-price terms are in progress, especially when there is no pending proceeding  
6 to adjudicate disputes between the parties regarding transport and termination pricing.  
7

8 GCI's interpretation of the scope of 47 C.F.R. § 51.715 is tortured and, if  
9 accepted, would impose unreasonable and impractical burdens on a rural ILEC that is attempting  
10 in good faith to meet its interconnection agreement negotiation obligations under Section 252. In  
11 addition, GCI's interpretation would, in effect, cut short the already-expedited statutory  
12 timeframes set forth in Section 252 for negotiating important non-price provisions of an  
13 interconnection agreement. This is completely inconsistent with the intent and function of  
14 Section 252 and would require a small ILEC to engage in simultaneous, parallel, substantive  
15 negotiations for both interim and permanent interconnection.  
16

17 For the foregoing reasons, CTC strongly urges the Commission to grant Interior's  
18 Petition for Declaratory Ruling.  
19

20 RESPECTFULLY SUBMITTED this 31st day of May, 2007.

21 KEMPEL, HUFFMAN AND ELLIS, P.C.  
22 Attorneys for Cordova Telephone Cooperative, Inc.

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25 Dean D. Thompson  
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